

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-20-277

TRAVIS GLENDON MARTIN, III

THIRD UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, Travis Glendon Martin, III, moves this Court for a 60-day continuance of the motions deadline, pretrial conference and trial, and respectfully shows as follows:

Mr. Martin is charged with one count of civil disturbance in violation of 18 U.S.C. § 231. The pretrial motions deadline was May 17, 2021, the pretrial conference is set for June 21, 2021, and trial is set for June 29, 2021.

Discovery in this case is ongoing, and undersigned counsel has begun her own legal and factual investigation. Undersigned counsel has identified certain legal and factual issues that require further investigation. Undersigned counsel needs more time to complete her investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Mr. Martin.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this Motion for Continuance.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By: /s/ Heather Hughes
HEATHER HUGHES
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Steven Schammel and determined that the United States is unopposed to this motion for continuance.

s/ Heather Hughes
HEATHER HUGHES

CERTIFICATE OF SERVICE

I certify that on Friday, June 11, 2021, a copy of the foregoing Third Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorney Steven Schammel.

s/ Heather Hughes
HEATHER HUGHES